

John:

The Safety Review itemizes, step by step, the process for product safety review and is proprietary.

The person at B&D responsible for this case is away until the end of the week. I'll discuss settlement with him and get back to you next week.

Regards,
Bob

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From: John Durst [mailto:john@durstlaw.com]

Sent: March 11, 2008 04:05 PM

To: Robert Calinoff

Subject: Re: Mourzakhanov

You really think it meets the standard for a protective order? I think you have to justify that a little more. I think I wrote an article on this 10-15 years ago, "Confidentiality Orders: Plaintiffs Should Resist Them", or something like that, for Trial Magazine. I'd be a hypocrite to accept that out of laziness, and so . . .

Wanna settle the case? \$50,000, now more hassle. And a confidentiality order.

John

----- Original Message -----

From: [Robert Calinoff](#)

To: [John Durst](#)

Sent: Tuesday, March 11, 2008 1:57 PM

Subject: Mourzakhanov

John:

I now have the claim information and Safety Review which you requested at the deposition of Ted Mitrou. We wish to produce this material pursuant to a Protective Order as some of it relates to Confidential or proprietary material. Do you have a form of order which you would propose to use or should I draft one? We can then hand deliver the material to you.

Regards,
Bob

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